

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

-against-

CHARLIE JAVICE and OLIVIER AMAR,

Defendants.

Case No.: 1:23-cr-00251-AKH

[Proposed] Verdict Form

I. COUNT ONE: Conspiracy to Commit Wire Fraud and Bank Fraud

As to COUNT ONE, how do you find CHARLIE JAVICE?

NOT GUILTY _____

GUILTY _____

As to COUNT ONE, how do you find OLIVIER AMAR?

NOT GUILTY _____

GUILTY _____

If your verdict is Not Guilty, proceed to **COUNT TWO** without checking any of the boxes below.

If your verdict is Guilty as to both defendants, you must unanimously agree as to the object of the conspiracy: Bank Fraud, Wire Fraud, or both. Check which of the boxes you have unanimously agreed is the object of the conspiracy charged in **COUNT ONE**.

WIRE FRAUD _____

BANK FRAUD _____

II. COUNT TWO: Wire Fraud

With respect to Capital One:

As to COUNT TWO, how do you find CHARLIE JAVICE?

NOT GUILTY _____ **GUILTY** _____

As to COUNT TWO, how do you find OLIVIER AMAR?

NOT GUILTY _____ **GUILTY** _____

With respect to J.P. Morgan Chase:

As to COUNT TWO, how do you find CHARLIE JAVICE?

NOT GUILTY _____ **GUILTY** _____

As to COUNT TWO, how do you find OLIVIER AMAR?

NOT GUILTY _____ **GUILTY** _____

III. COUNT THREE: Bank Fraud

With respect to Capital One:

As to COUNT THREE, how do you find CHARLIE JAVICE?

NOT GUILTY _____ **GUILTY** _____

As to COUNT THREE, how do you find OLIVIER AMAR?

NOT GUILTY _____ **GUILTY** _____

With respect to J.P. Morgan Chase:

As to COUNT THREE, how do you find CHARLIE JAVICE?

NOT GUILTY _____ **GUILTY** _____

As to COUNT THREE, how do you find OLIVIER AMAR?

NOT GUILTY _____ **GUILTY** _____

IV. COUNT FOUR: Securities Fraud

With respect to Capital One:

As to COUNT FOUR, how do you find CHARLIE JAVICE?

NOT GUILTY _____ **GUILTY** _____

If your verdict is Guilty as to Ms. Javice, you must unanimously agree as to the type of unlawful conduct proved in connection with the purchase or sale of securities of Frank: (a) employed a device, scheme, or artifice to defraud; or (b) made an untrue statement of a material fact or omitted to state a material fact that made what was said, under the circumstances, misleading. Check which of the boxes you have unanimously agreed is the unlawful conduct charged in COUNT FOUR.

(a) Employed a device, scheme, or artifice to defraud _____

(b) Made an untrue statement of a material fact or
omitted to state a material fact that made what was said,
under the circumstances, misleading. _____

As to COUNT FOUR, how do you find OLIVIER AMAR?

NOT GUILTY _____ **GUILTY** _____

If your verdict is Guilty as to Mr. Amar, you must unanimously agree as to the type of unlawful conduct proved in connection with the purchase or sale of securities of Frank: (a) employed a device, scheme, or artifice to defraud; or (b) made an untrue statement of a material fact or omitted to state a material fact that made what was said, under the circumstances, misleading. Check which of the boxes you have unanimously agreed is the unlawful conduct charged in COUNT FOUR.

(a) Employed a device, scheme, or artifice to defraud _____

(b) Made an untrue statement of a material fact or
Omitted to state a material fact that made what was said,
Under the circumstances, misleading. _____

With respect to J.P. Morgan Chase:

As to COUNT FOUR, how do you find CHARLIE JAVICE?

NOT GUILTY _____ **GUILTY** _____

If your verdict is Guilty as to Ms. Javice, you must unanimously agree as to the type of unlawful conduct in connection with the purchase or sale of securities of Frank: (a) employed a device, scheme, or artifice to defraud; or (b) made an untrue statement of a material fact or omitted to state a material fact that made what was said, under the circumstances, misleading. Check which of the boxes you have unanimously agreed is the unlawful conduct charged in COUNT FOUR.

(a) Employed a device, scheme, or artifice to defraud _____

(b) Made an untrue statement of a material fact or
Omitted to state a material fact that made what was said,
Under the circumstances, misleading. _____

As to COUNT FOUR, how do you find OLIVIER AMAR?

NOT GUILTY _____ **GUILTY** _____

If your verdict is Guilty as to Mr. Amar, you must unanimously agree as to the type of unlawful conduct in connection with the purchase or sale of securities of Frank: (a) employed a device, scheme, or artifice to defraud; or (b) made an untrue statement of a material fact or omitted to state a material fact that made what was said, under the circumstances, misleading. Check which of the boxes you have unanimously agreed is the unlawful conduct charged in COUNT FOUR.

(a) Employed a device, scheme, or artifice to defraud _____

(b) Made an untrue statement of a material fact or
Omitted to state a material fact that made what was said,
Under the circumstances, misleading. _____

New York, New York
_____, 2025

Foreperson